

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

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PAUL SPINELLI; SCOTT BOEHM; PAUL JASIENSKI;  
GEORGE NEWMAN LOWRANCE; DAVID STLUKA; :  
DAVID DRAPKIN; and THOMAS E. WITTE, :

Case 1:13-cv-07398 (RWS)

Plaintiffs,

: **ECF Case**

v.

:  
NATIONAL FOOTBALL LEAGUE; NFL PROPERTIES,  
LLC; NFL VENTURES, L.P.; NFL PRODUCTIONS, LLC; :  
NFL ENTERPRISES, LLC; REPLAY PHOTOS, LLC; :  
GETTY IMAGES (US), INC.; ASSOCIATED PRESS; :  
ARIZONA CARDINALS HOLDINGS, INC., ATLANTA  
FALCONS FOOTBALL CLUB LLC, BALTIMORE :  
RAVENS LIMITED PARTNERSHIP, BUFFALO BILLS,  
INC., PANTHERS FOOTBALL LLC, CHICAGO BEARS :  
FOOTBALL CLUB, INC., CINCINNATI BENGALS,  
INC., CLEVELAND BROWNS LLC, DALLAS :  
COWBOYS FOOTBALL CLUB, LTD., DENVER  
BRONCOS FOOTBALL CLUB, DETROIT LIONS, INC., :  
GREEN BAY PACKERS, INC., HOUSTON NFL  
HOLDINGS LP, INDIANAPOLIS COLTS, INC., :  
JACKSONVILLE JAGUARS LTD., KANSAS CITY  
CHIEFS FOOTBALL CLUB, INC., MIAMI DOLPHINS, :  
LTD., MINNESOTA VIKINGS FOOTBALL CLUB LLC,  
NEW ENGLAND PATRIOTS, LP, NEW ORLEANS :  
LOUISIANA SAINTS, LLC, NEW YORK FOOTBALL  
GIANTS, INC., NEW YORK JETS FOOTBALL CLUB, :  
INC., OAKLAND RAIDERS LP, PHILADELPHIA  
EAGLES FOOTBALL CLUB, INC., PITTSBURGH :  
STEELERS SPORTS, INC., SAN DIEGO CHARGERS  
FOOTBALL CO., SAN FRANCISCO FORTY NINERS :  
LTD., FOOTBALL NORTHWEST LLC, THE RAMS  
FOOTBALL CO. LLC, BUCCANEERS LIMITED :  
PARTNERSHIP, TENNESSEE FOOTBALL, INC., and  
WASHINGTON FOOTBALL INC., :

**AMENDED RULE 7.1  
DISCLOSURE STATEMENT**

Defendants.

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Pursuant to Rule 7.1(a) of the Federal Rules of Civil Procedure and to enable District Judges and Magistrate Judges of the Court to evaluate possible disqualification or recusal, the undersigned counsel for Defendants National Football League, NFL Ventures, L.P., NFL Productions, LLC, NFL Enterprises, LLC, NFL Properties, LLC and the 32 National Football League Clubs (collectively the “NFL Clubs”) hereby certifies as follows:

National Football League is an unincorporated association of 32 member clubs that does not have a parent corporation, and no publicly-held corporation owns 10% or more of its stock.

NFL Ventures, L.P. is a limited partnership of which the general partner is NFL Ventures, Inc., a non-publicly held corporation. No general or limited partner of NFL Ventures, L.P. owns 10% or more of the stock of NFL Ventures, L.P.

NFL Productions, LLC, NFL Enterprises, LLC, and NFL Properties, LLC are each wholly owned subsidiaries of NFL Ventures, L.P., and no publicly held corporation owns 10% or more of their stock.

The National Football League’s member clubs are:

|    | <b>Club</b>   | <b>Parent Corporation and/or Affiliate</b> |
|----|---|--|
| 1  | Arizona Cardinals Football Club LLC                             | None                                       |
| 2  | Atlanta Falcons Football Club LLC                               | None                                       |
| 3  | Baltimore Ravens Limited Partnership                            | None                                       |
| 4  | Buffalo Bills, LLC  | None                                       |
| 5  | Panthers Football LLC   | None                                       |
| 6  | The Chicago Bears Football Club, Inc.                           | None                                       |
| 7  | Cincinnati Bengals, Inc.  | None                                       |
| 8  | Cleveland Browns Football Company LLC                           | None                                       |
| 9  | Dallas Cowboys Football Club, Ltd.                              | None                                       |
| 10 | PDB Sports, Ltd. (d/b/a The Denver Broncos Football Club, Ltd.) | None                                       |
| 11 | The Detroit Lions, Inc.   | None                                       |
| 12 | Green Bay Packers, Inc.   | None                                       |
| 13 | Houston NFL Holdings, L.P.                                      | None                                       |
| 14 | Indianapolis Colts, Inc.  | None                                       |
| 15 | Jacksonville Jaguars LLC  | None                                       |
| 16 | Kansas City Chiefs Football Club, Inc.                          | None                                       |

|    |   |  |
|----|---|--|
| 17 | Miami Dolphins, Ltd.  | None   |
| 18 | Minnesota Vikings Football LLC  | None   |
| 19 | New England Patriots, LLC   | None   |
| 20 | New Orleans Louisiana Saints, LLC   | None   |
| 21 | New York Football Giants, Inc.  | None   |
| 22 | New York Jets LLC   | None   |
| 23 | The Oakland Raiders, a California Limited Partnership                                   | None   |
| 24 | Philadelphia Eagles, LLC  | None   |
| 25 | Pittsburgh Steelers LLC (affiliate of named defendant Pittsburgh Steelers Sports, Inc.) | Pittsburgh Steelers Sports Inc. is a majority owner of Pittsburgh Steelers Sports Holdco LLC, which owns Pittsburgh Steelers LLC |
| 26 | The St. Louis Rams, LLC   | None   |
| 27 | Chargers Football Company, LLC  | None   |
| 28 | Forty Niners Football Company LLC   | None   |
| 29 | Football Northwest LLC  | None   |
| 30 | Buccaneers Limited Partnership  | None   |
| 31 | Tennessee Football, Inc.  | KSA Industries, Inc.   |
| 32 | Pro-Football, Inc. (affiliate of named defendant Washington Football, Inc.)             | Pro-Football, Inc. is a subsidiary of WFI Group, Inc., which is a subsidiary of Washington Football, Inc.                        |

No publicly held corporation owns 10% or more of the stock of any National Football League member club.

Dated: January 7, 2015  
New York, New York

/s/ Jeffrey A. Mishkin  
Jeffrey A. Mishkin  
Anthony J. Dreyer  
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*Counsel for National Football League,  
NFL Ventures, L.P., NFL Productions,  
LLC, NFL Enterprises, LLC, NFL  
Properties, LLC and the 32 NFL Clubs*